

EXHIBIT 20

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11948-RGS

SEYED MOHSEN HOSSEINE-SEDEHY,)
Plaintiff)
vs.)
ERIN T. WITHINGTON and)
THE CITY OF BOSTON,)
Defendants)

DEPOSITION OF MOHSEN HOSSEINI, a
witness called on behalf of the Defendants,
pursuant to the Massachusetts Rules of Civil
Procedure, before Kelly G. Patterson, a
Notary Public in and for the Commonwealth of
Massachusetts, at the Law Department of City
Hall, Room 615, Boston, Massachusetts, on
Friday, October 14, 2005, commencing at
1:23 a.m.

1 not accepted. This whole thing went for
2 months, so Mr. Perry hadn't worked for
3 months.
4 Q. Was this Mr. Perry or Mr. Bavis?
5 A. Thank you for correcting me, Mr. Bavis. So
6 Mr. Bavis, literally, I don't remember
7 exactly when in 2002, sometime in 2002,
8 after that incident, a month later or two
9 months later, I don't remember exactly, I
10 need to look at the show schedules again.
11 Everything I do and live by is the show
12 schedules. That incident happened, and I
13 told Detective Schroeder about that
14 incident. She asked me clearly a couple of
15 times how I hold him and I explained.
16 Q. What did you explain?
17 A. I asked permission, I believe, because --
18 no, I did not reach on her. Excuse me, I
19 take that back. I thought maybe I reached
20 and showed her on her shoulder, but I did
21 not. I showed her on my own shoulder.
22 "Joe, calm down. Come on, buddy. Calm
23 down."
24 Q. You were facing Mr. Bavis eye to eye?

1 A. I was facing Mr. Bavis eye to eye.
2 Q. Did you describe any other physical
3 interactions between you and Mr. Bavis?
4 A. No. That was the only physical incident --
5 when Detective Schroeder asked me if there
6 was ever any incident, I told her that
7 incident.
8 Q. There has been no other?
9 A. No other incidents.
10 Q. Did she ask you questions about any other
11 incidents between you and Mr. Bavis?
12 A. Actually, I believe she did not, because
13 even after my arrest, after I walked out of
14 her office, I was still under the assumption
15 Joe Perry. When I was arrested, went to
16 court and was arraigned, I was still under
17 the assumption Joe Perry. It was well after
18 I was home that I found out it was Joe
19 Bavis.
20 Q. Who was making the accusations?
21 A. Yes, ma'am.
22 Q. Going back to your meeting with Detective
23 Schroeder, how long did you meet with
24 Detective Schroeder?

1 A. Again, I don't remember the exact timeline,
2 but I want to say it was a good half hour.
3 Q. During this meeting, there were three of
4 you, the other detective and Detective
5 Schroeder and yourself?
6 A. Yes, ma'am.
7 Q. Were you in a room or an office?
8 A. It was in an office in the Sexual Harassment
9 Unit.
10 Q. Was the door closed or open?
11 A. I apologize.
12 Q. You don't remember? That's okay. Only what
13 you can remember.
14 A. I can't remember. I want to say for my
15 privacy they closed the door, but I don't
16 remember.
17 Q. Did you describe anything else, other than
18 what you described to me thus far?
19 A. No. I answered all her questions.
20 Detective Schroeder turned to the other
21 lady, asked if she had any questions. She
22 replied no. I asked what next. I got the
23 indication, was true words spoken, or it
24 must have been true words spoken, I don't

1 know exact words spoken, "Don't worry about
2 it. These cases usually go to the D.A.'s
3 office and if D.A. wants to pursue it they
4 will contact you."
5 Q. Who told you that?
6 A. Detective Schroeder.
7 Q. Those are a paraphrase of what you believe
8 her words were?
9 A. Parts of it were her words. "These cases go
10 to the D.A.'s office," were her words, "and
11 if the D.A. elects to, they will contact
12 you."
13 Q. Did she tell you at that point that you
14 would be arrested at that point?
15 A. No.
16 Q. Or that you would be arrested at that point?
17 A. No, she did not, ma'am. I wanted to say
18 something like -- no, I don't remember,
19 ma'am. No, she did not.
20 Q. Did you give Detective Schroeder any
21 documents or anything like that or fill out
22 any reports or statements?
23 A. I personally do not remember filling out
24 anything. She did all the notetaking.